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July 6, 2021

VIA ECF

The Honorable Stewart D. Aaron
United States Magistrate Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 1970
New York, NY 10007
Aaron_NYSDChambers@nysd.uscourts.gov

Application GRANTED. The Initial Pretrial Conference currently scheduled for July 27, 2021 is adjourned until September 13, 2021 at 11:00 a.m. SO ORDERED.
Dated: July 7, 2021

Re: *City National Bank v. Banco del Estado de Chile, et al.* Case No. 21-03906

Dear Judge Aaron:

We represent Plaintiff City National Bank (“CNB”) in the above-mentioned matter. On behalf of all parties, we write to request an adjournment of the Telephonic Initial Pretrial Conference (“Conference”), scheduled for July 27, 2021 at 2:00 pm. Defendants Banco del Estado de Chile (“Banco”) and Donnelly Mechanical Corporation (“Donnelly”) (collectively “Defendants”) each consent to this request.

Donnelly and Banco were served with CNB’s Complaint on May 12 and May 14, respectively. Thereafter, CNB and Defendants jointly requested that Defendants be granted additional time to respond to the Complaint. The Court granted the request and required Defendants’ responses by June 14. Doc. No. 12. Defendants responded to the Complaint by the deadline, through an Answer, and asserted third-party complaints against certain non-parties. The last third-party complaint was filed last week, with summons requested for three non-parties. In total, Defendants seek to bring in four additional parties to this action, and to date, they have not been served or been provided an opportunity to respond to the third-party actions against them.

In light of the foregoing, we request that the Conference be adjourned and postponed to permit Defendants time to serve the third-parties and to provide the third-parties with an opportunity to obtain counsel, appear, and respond to the allegations against them. The parties are available to appear for the Conference on September 9, 10, 13 or 17, or at a time that the Court prefers that is after September 8. The parties agree that it would be more productive and efficient if some or all of the third-parties have made appearances and can attend the Conference with Your Honor. There has not been a request regarding the time of the Conference made prior and the request does not interfere with any previously scheduled deadlines.



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We thank Your Honor for your continued attention to this matter.

Very truly yours,

/s/ Howard J. Rubin

Howard J. Rubin

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cc: All Counsel of Record (via ECF)
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